

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATE OF AMERICA, and)
STATE OF NEW MEXICO, ex rel. STATE)
ENGINEER,)
))
Plaintiffs,)
))
and)
))
ZUNI INDIAN TRIBE, NAVAJO NATION,)
))
Plaintiffs in Intervention,)
))
v.)
))
A & R PRODUCTIONS, et al.,)
))
Defendants.)
))
))
))

CIV. NO. 07-00681 BDB/WDS

**ZUNI RIVER BASIN
ADJUDICATION**

**Sub-proceedings 1
Zuni Indian Claims**

MOTION FOR EXTENSION OF TIME

COMES NOW, Broe Land Acquisitions III, LLC (“Broe”), by and through its counsel of record, and hereby moves the Court for an order extending the time in which to respond to the United States’ Motion for Protective Order [Doc. 286] until April 2, 2010. As grounds for this Motion, Broe states as follows:

1. The United State filed its Motion for Protective Order despite specific requests from Broe that it be allowed extra time in which to confer in good faith with the United States regarding its discovery concerns;
2. Counsel for Broe is currently involved in responding to two motions for summary judgment, preparing for two trials, and preparing for and participating in a mediation effort for one of the scheduled trials;

3. This motion is timely in that a response to the Motion is not due until March 19, 2010;

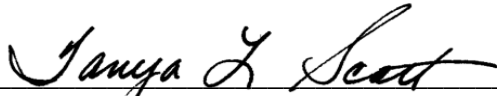
4. Counsel for the United States does not object to an extension of time until April 2, 2010 to respond to the Motion.

5. A proposed Order, attached hereto as Exhibit "1", is attached for the Special Master's consideration.

WHEREFORE, Broe Land Acquisitions III, LLC respectfully requests the Court grant this Motion and extend the time in which to respond to the United States' Motion for Protective Order [Doc. 286] until April 2, 2010.

Respectfully submitted,

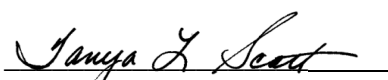
LAW & RESOURCE PLANNING ASSOCIATES,
A Professional Corporation

By: 

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on March 15, 2010, I filed the foregoing Motion for Extension of Time electronically through the CM/ECF system, which caused the parties or counsel reflected on the Notice of Filing to be served by electronic means.


Tanya L. Scott